

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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DEC 28 2005

PUBLIC SERVICE
COMMISSION

In the Matter of:

THE APPLICATION OF)
COLUMBIA GAS OF KENTUCKY, INC.)
FOR AUTHORITY TO ALLOCATE)
THE PROCEEDS OF ITS STRANDED COST/)
RECOVERY POOL)

Case No. 2005-00446

**MOTION OF CAC FOR LEAVE TO SERVE
DATA REQUESTS, FOR AN INFORMAL CONFERENCE, AND
TO FILE WRITTEN COMMENTS**

Come now the Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. (CAC), by counsel, and hereby moves the Commission for leave to serve the first data requests, tendered herewith, upon Columbia Gas of Kentucky, Inc. (Columbia). In support of this motion, CAC states that it was permitted to intervene in this action by order dated December 7, 2005 and the deadline for submission of data requests to Columbia was December 9, 2005, two days later. Furthermore, granting this motion will not unduly prejudice any party to this proceeding, and is necessary in order for CAC to determine whether to request a formal hearing in this matter or whether to submit written comments on the application.

In addition, CAC moves the Commission to set an informal conference in this matter. CAC submits that an informal conference could be useful to determining whether a formal hearing is necessary or whether written comments from the parties will be sufficient.

Finally, in the event the Commission determines that a formal hearing is not necessary on

this application, CAC respectfully requests leave to file written comments.



JOE F. CHILDERS
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**ATTORNEY FOR COUNCIL FOR
LEXINGTON-FAYETTE, BOURBON,
HARRISON AND NICHOLAS
COUNTIES, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing document has been served on the following persons on this the 27th day of December, 2005.

Lawrence W. Cook, Esq.
Office of the Attorney General
Utility & Rate Intervention Division
1024 Capital Center Drive
Suite 200
Frankfort, KY 40601

Stephen B. Seiple, Esq.
Columbia Gas of Kentucky, Inc.
200 Civic Center Drive
P.O. Box 117
Columbus, OH 43216



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Case No. 2005-00446

FIRST DATA REQUESTS TO COLUMBIA GAS FROM CAC

Come now the Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. (CAC), by counsel, and hereby submits its first Data Requests to Columbia Gas of Kentucky, Inc. (Columbia):

DATA REQUESTS

1. Please provide copies of all documents, including but not limited to, papers, notes, memoranda, data in electronic or digital format, or any other materials of any kind used by Columbia to determine the concept of and cost request for the alternative proposal as described in the application.
2. In the application, Columbia refers to the 10% allocation of the Stranded Cost/Recovery Pool to weatherization activities as both a "proposal" and as an "alternative." Please clarify if this 10% allocation is indeed a proposal or just a suggested alternative to the main proposal. If your answer indicates that the allocation is an alternative to the main proposal, please describe the criteria that Columbia suggests be used in determining which alternative has greater merit.



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